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Attorneys for Plaintiffs  
NEIL LIEBICK, SHARON CLARK,  
individually and as guardian ad litem for  
JANE DOE 1, JANE DOE 2, and JOHN  
DOE; and JASON FRANKLIN

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

NEIL LIEBICK, SHARON CLARK,  
individually and as guardian ad litem for  
JANE DOE 1, JANE DOE 2, and JOHN  
DOE; and JASON FRANKLIN,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC., COSTCO WHOLESALE CORP.,  
and DOES 1-10,

Defendants.

Case No. 2:25-cv-01300-DJC-DMC

**STIPULATION AND ORDER TO EXTEND  
BRIEFING DEADLINES RELATED TO  
DEFENDANTS' MOTION TO DISMISS**

Hearing Date: November 6, 2025  
Time: 1:30 p.m.  
Judge: Hon. Daniel Calabretta

Removal Filed: May 5, 2025

1 Plaintiffs NEIL LIEBICK, SHARON CLARK, individually and as guardian ad litem for JANE  
2 DOE 1, JANE DOE 2, and JOHN DOE; and JASON FRANKLIN (“Plaintiffs”) and Defendants  
3 SAMSUNG ELECTRONICS AMERICA, INC. and COSTCO WHOLESALE CORP. (“Defendants”)  
4 (collectively “Parties”), through their respective counsel, hereby stipulate and agree as follows:

5 WHEREAS, on September 9, 2025, Defendants filed a Motion to Dismiss the Second Amended  
6 Complaint (ECF No. 22);

7 WHEREAS, pursuant to E.D. Cal. Local Rule 230(c), Plaintiffs’ Opposition was due on  
8 September 23, 2025, and Defendants’ Reply is due on October 3, 2025

9 WHEREAS, the hearing on the Motion to Dismiss is currently set for November 6, 2025;

10 WHEREAS, due to a calendaring mistake on Plaintiffs’ part explained by the legal assistant for  
11 Plaintiffs’ counsel being absent for an extended period for medical reasons, the deadline to file the  
12 Opposition was mis-calendared, resulting in Plaintiff missing the briefing deadline;

13 WHEREAS, Plaintiffs’ counsel promptly contacted counsel for SAMSUNG to explain the  
14 oversight and requested that Defendants stipulate to an extension for Plaintiffs to file their Opposition;

15 WHEREAS, Costco’s counsel being away from the office without cell service until September  
16 29, 2025, Plaintiff’s counsel could not confirm his agreement to this Stipulation until his return;

17 WHEREAS, the parties have agreed to a brief extension of the briefing deadlines;

18 WHEREAS, pursuant to the stipulated extension, Plaintiffs’ Opposition will now be due on  
19 September 30, 2025, and Defendants’ Reply due on October 14, 2025;

20 WHEREAS, the Parties’ stipulated extension would have no impact on the hearing date, which  
21 remains scheduled for November 6, 2025;

22 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their  
23 respective counsel of record, HEREBY STIPULATE and respectfully request that the Court enter an  
24 order as follows:

- 25 1. Plaintiffs’ deadline to file their Opposition to the Motion to Dismiss shall be extended from  
26 September 23 to **September 30, 2025**;
- 27 2. Defendants’ deadline to file their reply shall be extended from October 3, 2025, to **October 14,**  
28 **2025**;

3. The hearing on the Motion to Dismiss shall remain scheduled for **November 6, 2025**;

**IT IS SO STIPULATED.**

Dated: September 30, 2025

**GREENBERG TRAURIG, LLP**

By: /s/  
Anna Yeung

Attorneys for Defendant  
SAMSUNG ELECTRONICS AMERICA, INC.

Dated: September 30, 2025

**COOK LAW GROUP**

By: /s/  
Ronald J. Cook  
Attorney for Plaintiffs

Dated: September 30, 2025

**MAIRE & DEEDON**

By: /s/  
Patrick Deedon

Attorney for Defendant  
COSTCO WHOLESALE CORP.

**ORDER**

Pursuant to the Parties' Stipulation to Extend Briefing Deadlines Related to Defendants' Motion to Dismiss and good cause appearing, the Court orders as follows:

1. Plaintiffs' deadline to file their Opposition to the Motion to Dismiss is extended to **September 30, 2025;**
2. Defendants' deadline to file their reply is extended to **October 14, 2025;**
3. The hearing on the Motion to Dismiss remains set for **November 6, 2025.**

**IT IS SO ORDERED.**

Dated: September 30, 2025

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE